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December 9, 2022

Honorable Andrew B. Altenburg, Jr.
United States Bankruptcy Court
Mitchell H. Cohen U.S. Courthouse
400 Cooper Street, 4th Floor
Camden, New Jersey 08101

Re: Gilberg - Chapter 7 Bankruptcy Case No. 19-27600/ABA – Supplemental Objection to
Trustee Counsel and Special Counsel Fee Applications [D.I. 86] [D.I. 87] [D.I. 88] [D.I. 98]
[D.I. 99]

Dear Judge Altenburg:

Please accept this letter in lieu of a more formal supplemental objection to the three (3) pending fee applications pending before the Court filed by McDowell Law, P.C. and Bort Law. *See* D.I. 86, 87, 88, 98 and 99.

At the last hearing, the Court requested that itemized time sheets be produced showing the time spent in 1/10th of an hour increments by date, person, and description of services rendered.

On November 29, 2022, Trustee Counsel filed two itemized time sheets with the Court. *See* D.I. 98 and 99.

To date, however, Special Counsel has failed to file any itemized time sheets.

Due to Special Counsel's failure to produce any itemized time sheets, it is impossible to know whether Trustee Counsel and Special Counsel have double billed.

Notwithstanding the foregoing, Trustee Counsel's itemized time sheets reflect an extraordinary amount of time improperly and potentially double billed.

Neither Trustee Counsel or Special Counsel should be allowed any fees that could have been potentially double billed unless and until Special Counsel produced an itemized time sheet.

Moreover, Trustee Counsel should not be allowed any fees for excessive billing, acting as liason between special counsel and trustee, the fictional "bankruptcy mediation" it billed for, review of claims, investigation of the debtor's financial affairs, retention applications, or other ministerial and standard trustee duties.

I. Trustee Counsel's Matrimonial Case Work, Communications with Special Counsel, and Acting as Liason Between Special Counsel and Trustee

Trustee Counsel's itemized time sheets reflect an extraordinary amount of time billed for Trustee Counsel matrimonial case work, communications between Trustee Counsel and Special Counsel, and Trustee Counsel acting as a liason between Special Counsel and the Trustee.

Below are some (not all) of the foregoing inappropriate and potentially double billed time entries.

Trustee Counsel's Matrimonial Case Work, Communications with Special Counsel, Acting as Liason Between Special Counsel and Trustee:

Date	Attorney	Description	Hours	Rate	Fee
11/02/20	PP	Bankruptcy Case Administration Review of email from proposed special counsel and forward same to client	0.2	\$320.00	\$64.00
11/02/20	PP	Bankruptcy Case Administration Telephone conference with client re procedure issues pointed out by special counsel	0.2	\$320.00	\$64.00
12/22/20	PP	Bankruptcy Case Administration emails to/from special counsel re new matrimonial lawyer for Debtor	0.3	\$320.00	\$96.00
12/28/20	PP	Bankruptcy Case Administration email from special counsel re new matrimonial counsel and forward to special counsel	0.2	\$320.00	\$64.00
01/08/21	PP	Bankruptcy Case Administration Telephone conference with Michael Vagnoni re 2004 and possible meeting of the parties	0.2	\$320.00	\$64.00
01/08/21	PP	Bankruptcy Case Administration Conference with JAM re Telephone conference with Michael Vagnoni re 2004 and possible meeting of the parties	0.1	\$320.00	\$32.00
01/08/21	PP	Bankruptcy Case Administration Telephone conference with client Telephone conference with Michael Vagnoni re 2004 and possible meeting of the parties	0.2	\$320.00	\$64.00
01/08/21	PP	Bankruptcy Case Administration Prepare memo to file re Telephone conference with Michael Vagnoni re 2004 and possible meeting of the parties	0.2	\$320.00	\$64.00
01/25/21	PP	Bankruptcy Case Administration Telephone conference with Special counsel re documents and communications with Brian Gilbert's attorneys	0.2	\$320.00	\$64.00
01/25/21	PP	Bankruptcy Case Administration Telephone conference with counsel for Mr. Gilbert re 2004, documents, how to proceed	0.3	\$320.00	\$96.00
01/25/21	PP	Bankruptcy Case Administration email to parties confirming p/c re documents	0.3	\$320.00	\$96.00
02/01/21	PP	Bankruptcy Case Administration email to/from Shelly Bobman re documents and communications with counsel for non-debtor spouse	0.2	\$320.00	\$64.00
02/16/21	PP	Bankruptcy Case Administration Telephone conference with Shelly Bobman re response to 2004 supoea	0.2	\$320.00	\$64.00
02/17/21	PP	Bankruptcy Litigation email to from Special counsel re date used for valuation of equitable distribution in Pennsylvania	0.2	\$320.00	\$64.00
02/18/21	PP	Bankruptcy Litigation email to /from special counsel re adequacy of documents received	0.2	\$320.00	\$64.00
02/23/21	PP	Bankruptcy Case Administration email to/from special counsel re letter from Brian Gilbert's counsel re documents	0.1	\$320.00	\$32.00

03/10/21	PP	Bankruptcy Case Administration email to/from Shelley Bobman re settlement offer	0.3	\$320.00	\$96.00
03/10/21	JAM	Bankruptcy Case Administration- review letter fro Brian Gilberg divorce counsel and conference with PSP	0.4	\$420.00	\$168.00
03/10/21	PP	Bankruptcy Litigation Telephone conference with client re status and settlement offer (two calls)	0.3	\$320.00	\$96.00
03/10/21	PP	Bankruptcy Case Administration Review of settlement offer	0.8	\$320.00	\$256.00
03/10/21	PP	Bankruptcy Case Administration Letter to client re status and settlement offer	2.4	\$320.00	\$768.00
03/11/21	PP	Bankruptcy Litigation revise analysis of settlement offer and status report	1.8	\$320.00	\$576.00
03/11/21	PP	Bankruptcy Litigation Telephone conference with client re settlement offer	0.2	\$320.00	\$64.00
03/24/21	PP	Bankruptcy Case Administration email to forwarding emails from Shelly Bobman	0.1	\$320.00	\$32.00
03/31/21	PP	Bankruptcy Litigation email to Shelly Bobman re strategy	0.1	\$320.00	\$32.00
03/31/21	PP	Bankruptcy Litigation Telephone conference with client re settlement offer in matrimonial	0.2	\$320.00	\$64.00
03/31/21	PP	Bankruptcy Litigation Telephone conference with client re settlement offer in matrimonial	0.2	\$320.00	\$64.00
04/01/21	PP	Bankruptcy Litigation Telephone conference with Shelly Bobman re options.	0.4	\$320.00	\$128.00
04/01/21	PP	Bankruptcy Litigation email to client re conversation with Shely Bobman re pushing forward	0.2	\$320.00	\$64.00
04/05/21	PP	Bankruptcy Case Administration email to Shelly Bobman re availability	0.2	\$320.00	\$64.00
04/05/21	PP	Bankruptcy Case Administration Telephone conference with client re "Telephone conference with Court way"	0.1	\$320.00	\$32.00
04/15/21	PP	Bankruptcy Case Administration Legal Research search re partial marital property settlement agreements	0.4	\$320.00	\$128.00
04/30/21	PP	Bankruptcy Case Administration email to Shelly Bobman re responses	0.1	\$320.00	\$32.00
05/06/21	PP	Bankruptcy Case Administration Review of file and matrimonial case docket re status	0.2	\$320.00	\$64.00
05/07/21	PP	Bankruptcy Case Administration email to/from Shelly Bobman re status	0.2	\$320.00	\$64.00
05/10/21	PP	Bankruptcy Case Administration Telephone conference with Shelley Bobman re communications with Debtor's matrimonial counsel	0.2	\$320.00	\$64.00
05/13/21	PP	Bankruptcy Case Administration review and analyze settlement offer in matrimonial action	1.2	\$320.00	\$384.00
05/13/21	PP	Bankruptcy Case Administration email to Trustee re new settlement offer	0.3	\$320.00	\$96.00
05/14/21	JAM	Bankruptcy Case Administration- Review of proposal from Divorce special counsel and conference with PSP	0.4	\$420.00	\$168.00
05/14/21	PP	Bankruptcy Case Administration Telephone conference with special counsel re offer from Debtor's husband	0.2	\$320.00	\$64.00
05/14/21	PP	Bankruptcy Case Administration Telephone conference with client l re offer from Debtor's husband	0.2	\$320.00	\$64.00
05/14/21	PP	Bankruptcy Case Administration Telephone conference with Michael Infanti re offer from Debtor's husband	0.4	\$320.00	\$128.00
05/17/21	PP	Bankruptcy Case Administration email to special counsel and opposing counsel requesting additional information re settlement	0.3	\$320.00	\$96.00
05/17/21	PP	Bankruptcy Case Administration email to Shelly Bobman re settlement negotiations and tax issues	0.2	\$320.00	\$64.00
05/17/21	PP	Bankruptcy Case Administration review and respond to email from Shelly Bobman with communication with opposing counsel re settlement	0.2	\$320.00	\$64.00
05/17/21	PP	Bankruptcy Case Administration email to special counsel and opposing counsel requesting additional information re settlement	0.3	\$320.00	\$96.00
05/17/21	PP	Bankruptcy Case Administration Review of draft motion to intervene	0.2	\$320.00	\$64.00
05/18/21	PP	Bankruptcy Case Administration email to/ from Shelley Bobman re proposed telephone conference	0.2	\$320.00	\$64.00
05/18/21	PP	Bankruptcy Case Administration Review of draft motion to intervene, letter opinion	0.6	\$320.00	\$192.00
05/19/21	PP	Bankruptcy Case Administration Review of revised motion to intervene from special	0.3	\$320.00	\$96.00

		counsel			
05/19/21	PP	Bankruptcy Case Administration Review of revised motion to intervene from special counsel	0.3	\$320.00	\$96.00
05/19/21	PP	Bankruptcy Case Administration Review and analyze proposed settlement between debtor and ex-husband	0.6	\$320.00	\$192.00
05/20/21	PP	Bankruptcy Case Administration Telephone conference with Special counsel re settlement proposal and next steps	0.4	\$320.00	\$128.00
05/20/21	PP	Bankruptcy Case Administration Telephone conference with client re motion to intervene	0.1	\$320.00	\$32.00
05/20/21	PP	Bankruptcy Case Administration prepare for phone conference with counsel for Brian Gilberg	0.4	\$320.00	\$128.00
05/20/21	PP	Bankruptcy Case Administration Telephone conference with counsel for Brian Gilberg re settlement proposal	0.9	\$320.00	\$288.00
05/20/21	PP	Bankruptcy Case Administration analyze allocation issues	0.8	\$320.00	\$256.00
05/21/21	PP	Bankruptcy Case Administration email to Michael Infanti re structuring QUADRO.	0.2	\$320.00	\$64.00
05/21/21	PP	Bankruptcy Case Administration preparing analyses and negotiating points for allocation of equitable distribution.	2.4	\$320.00	\$768.00
05/24/21	PP	Bankruptcy Case Administration email to/from Michael Infanti re 401K and plan administrator	0.2	\$320.00	\$64.00
05/24/21	PP	Bankruptcy Case Administration File Review for information on husband's 401K	0.1	\$320.00	\$32.00
05/26/21	PP	Bankruptcy Case Administration Review of email from Special Counsel re filing of motion to intervene	0.1	\$320.00	\$32.00
05/27/21	PP	Bankruptcy Case Administration Telephone conference with client re information required by accountants; structuring settlement	0.2	\$320.00	\$64.00
05/28/21	PP	Bankruptcy Case Administration email to/from (three) Shelley Bobman re QDRO and 401K tax issues	0.2	\$320.00	\$64.00
06/02/21	PP	Bankruptcy Case Administration email to Shelley Bobman re approaches to mediation	0.1	\$320.00	\$32.00
06/02/21	PP	Bankruptcy Case Administration emails from and re attorney who may write QDRO	0.1	\$320.00	\$32.00
06/03/21	PP	Bankruptcy Case Administration email to/from Special counsel re scheduled phone conference	0.3	\$320.00	\$96.00
06/03/21	PP	Bankruptcy Case Administration Review of memo from special counsel re equitable distribution prospects	0.2	\$320.00	\$64.00
06/03/21	PP	Bankruptcy Case Administration email to/from Shelley Bobman re p/c with Frank Makos re equitable distribution	0.2	\$320.00	\$64.00
06/03/21	PP	Bankruptcy Case Administration email to/from client re non-debtor spouse liquidation of 401K	0.2	\$320.00	\$64.00
06/03/21	PP	Bankruptcy Case Administration Telephone conference with Frank Makos re negotiations with Brian Gilberg	0.3	\$320.00	\$96.00
06/04/21	PP	Bankruptcy Case Administration email to/from Shelley Bobman re house value	0.2	\$320.00	\$64.00
06/08/21	JAM	Bankruptcy Case Administration- Telephone conference with Shelley Bobman re issues re Telephone conference with Court way	0.3	\$420.00	\$126.00
06/08/21	JAM	Bankruptcy Case Administration- review email from Bobman re new values and forward to client	0.4	\$420.00	\$168.00
06/08/21	PP	Bankruptcy Case Administration- Preliminary review of file re Telephone conference with Court way conference scheduled on Monday	1.2	\$320.00	\$384.00
06/09/21	JAM	Bankruptcy Case Administration- Telephone conference with Bobman re petition to intervene	0.2	\$420.00	\$84.00
06/09/21	JAM	Bankruptcy Case Administration- Legal Research re intervention	0.4	\$420.00	\$168.00
06/10/21	JAM	E-mail to S. Bobman with our position summary memo	0.2	\$420.00	\$84.00
06/10/21	JAM	Bankruptcy Case Administration- email to to PA Family Court re zoom conference re intervention	0.3	\$420.00	\$126.00
06/14/21	JAM	Bankruptcy Case Administration- pc with Bobman re pre hearing issues on intervention motion	0.3	\$420.00	\$126.00
06/22/21	JAM	Bankruptcy Case Administration- email to client re document production to Makos	0.2	\$420.00	\$84.00
06/25/21	JAM	Bankruptcy Case Administration- email to Shelly Bobman re Debtor actions in Family Court	0.2	\$420.00	\$84.00

07/14/21	PP	Bankruptcy Case Administration email to to Trustee forwarding email from Special counsel and status	0.2	\$320.00	\$64.00
07/14/21	PP	Bankruptcy Case Administration Telephone conference with Shelley Bobman re status	0.2	\$320.00	\$64.00
07/19/21	PP	Bankruptcy Case Administration email from Michael Bertin re 401K and forward to accountant and Trustee	0.2	\$320.00	\$64.00
07/26/21	PP	Bankruptcy Case Administration email to accountant forwarding 401K documents from Debtor's husband's attorney	0.2	\$320.00	\$64.00
08/10/21	PP	Bankruptcy Case Administration email to/from Michael Infanti re 401K issues	0.2	\$320.00	\$64.00
08/20/21	PP	Bankruptcy Case Administration email to Shelley Bobman re status	0.1	\$320.00	\$32.00
08/20/21	PP	Bankruptcy Case Administration email to Michael Infanti re 401K	0.1	\$320.00	\$32.00
08/23/21	PP	Bankruptcy Case Administration email to/from Shelly Bobman and husband counsel re 401K	0.2	\$320.00	\$64.00
09/09/21	PSP	Communicate (opponents/other outside counsel) Emails to/from Shelley Bobman and parties regarding setting up conference call.	0.2	\$320.00	\$64.00
09/28/21	PSP	Communicate (other external): emails to/from Shelley Bobman regarding PSA	0.2	\$320.00	\$64.00
09/28/21	JAM	Review/analyze PSA between Brian and Megan Gilberg	0.3	\$320.00	\$96.00
09/28/21	PSP	Communicate (with client) regarding PSA received from Counsel for Brian Gilberg	0.1	\$320.00	\$32.00
09/28/21	PSP	Review/analyze PSA and prior settlement offers	2.4	\$320.00	\$768.00
09/29/21	PSP	Communicate (opponents/other outside counsel) Shelly Bobman regarding PSA	0.1	\$320.00	\$32.00
09/29/21	PSP	Communicate (opponents/other outside counsel) telephone call with Shelly Bobman regarding PSA	0.4	\$320.00	\$128.00
09/29/21	PSP	Review/analyze PSA and prior offers, prepare memo regarding same	2.4	\$320.00	\$768.00
09/30/21	PSP	Review/analyze PSA and revise comments	0.6	\$320.00	\$192.00
09/30/21	PSP	Communicate (with client) email to Trustee regarding PSA	0.2	\$320.00	\$64.00
09/30/21	PSP	Communicate (with client) telephone call with Joe Marchand regarding proposed response to PSA and tax questions	0.1	\$320.00	\$32.00
10/02/21	PSP	Communicate (opponents/other outside counsel) emails to/from Shelley Bobman regarding need to object to PSA immediately	0.2	\$320.00	\$64.00
10/02/21	PSP	Communicate (opponents/other outside counsel) email to special counsel regarding memo of law and communications to opposing counsel	0.2	\$320.00	\$64.00
10/02/21	PSP	Draft/revise proposed letter to opposing counsel regarding PSA they negotiated	0.3	\$320.00	\$96.00
10/04/21	PSP	Communicate (with client) telephone call with client regarding Pennsylvania Special counsel's proposed motion	0.2	\$320.00	\$64.00
10/04/21	PSP	Review/analyze draft pleadings from special counsel	0.1	\$320.00	\$32.00
10/04/21	PSP	Communicate (opponents/other outside counsel) Emails to/from JAM, Trustee, and Special counsel regarding proposed motion	0.2	\$320.00	\$64.00
10/04/21	PSP	Communicate (opponents/other outside counsel) email to/from special counsel regarding Kasen email demanding information	0.2	\$320.00	\$64.00
10/05/21	PSP	Communicate (with client) email to client with filed pleadings from Special counsel	0.1	\$320.00	\$32.00
10/05/21	PSP	Communicate (opponents/other outside counsel) Email to Special Counsel regarding hearing date.	0.1	\$320.00	\$32.00
10/07/21	PSP	Communicate (opponents/other outside counsel) emails to/from special counsel regarding response to Jenny Kasen's inquiry regarding calculations	0.2	\$320.00	\$64.00
10/07/21	PSP	Review/analyze correspondence from Michael Bertin regarding negotiations	0.3	\$320.00	\$96.00
10/08/21	PSP	Communicate (opponents/other outside counsel) telephone call with Shelley Bobman regarding responding to Bertin letter	0.1	\$320.00	\$32.00
10/08/21	PSP	Communicate (with client) email to client regarding Bertin letter	0.2	\$320.00	\$64.00
10/11/21	PSP	Communicate (opponents/other outside counsel) email to/from special counsel regarding response to Betin	0.2	\$320.00	\$64.00
10/11/21	PSP	Communicate (with client) telephone call with Trustee regarding Gilberg communications and planned response	0.2	\$320.00	\$64.00

10/27/21	PSP	Communicate (opponents/other outside counsel) emails to Trustee and special counsel regarding proposed phone conference	0.1	\$320.00	\$32.00
11/03/21	PSP	Email to special counsel with questions prior to telephonic settlement conference	0.4	\$320.00	\$128.00
11/03/21	PSP	Review/analyze matrimonial filings	0.1	\$320.00	\$32.00
11/04/21	PSP	Communicate (opponents/other outside counsel) telephone call with Shelley Bobman regarding multi-party phone conference	0.3	\$320.00	\$96.00
11/04/21	PSP	Communicate (opponents/other outside counsel) telephone call with Shelly Bobman regarding zoom conference	0.2	\$320.00	\$64.00
11/04/21	PSP	Communicate (opponents/other outside counsel) email to/from Shelley Bobman regarding equitable distribution issues	0.3	\$320.00	\$96.00
11/04/21	PSP	Communicate (opponents/other outside counsel) zoom conference with parties in matrimonial regarding PSA	0.6	\$320.00	\$192.00
11/04/21	PSP	Communicate (in firm) telephone call with JAM regarding all party zoom conference	0.1	\$320.00	\$32.00
11/04/21	PSP	Draft/revise memo to file regarding zoom conference	0.8	\$320.00	\$256.00
11/04/21	JAM	Review/analyze proposals and emails between parties in Preparation of answer to divorce litigation	0.3	\$420.00	\$126.00
11/05/21	PSP	Communicate (with client) review and forward emails from special counsel regarding equitable distributions	0.2	\$320.00	\$64.00
11/08/21	PSP	Review/analyze emails between parties regarding documents, phone conference	0.2	\$320.00	\$64.00
11/08/21	PSP	Review/analyze PSA and divorce communications	0.9	\$320.00	\$288.00
11/09/21	PSP	Communicate (opponents/other outside counsel) telephone call with with special counsel regarding her analysis.	0.2	\$320.00	\$64.00
11/09/21	PSP	Communicate (opponents/other outside counsel) emails between parties regarding zoom conference	0.2	\$320.00	\$64.00
11/09/21	PSP	Communicate (opponents/other outside counsel) zoom conference regarding settlement divorce issues	0.8	\$320.00	\$256.00
11/11/21	PSP	Review/analyze memo from Shelly Bobman regarding matrimonial assets	0.2	\$320.00	\$64.00
11/11/21	PSP	Communicate (opponents/other outside counsel) Emails to/from Shelley Bobman regarding assets of marital estate.	0.2	\$320.00	\$64.00
11/12/21	PSP	Review/analyze Memo from special counsel regarding equitable distribution	0.4	\$320.00	\$128.00
11/12/21	PSP	Communicate (with client) telephone call with Joe Marchand regarding negotiations and analysis of special counsel	0.4	\$320.00	\$128.00
11/12/21	PSP	Communicate (opponents/other outside counsel) emails to special counsel regarding 401K and fees	0.2	\$320.00	\$64.00
11/15/21	PSP	Communicate (opponents/other outside counsel) emails to/from special counsel regarding 401K math, communications with opposing counsel, settlement	0.2	\$320.00	\$64.00
11/16/21	PSP	Communicate (with client) email to special counsel with revised analysis.	0.1	\$320.00	\$32.00
11/16/21	PSP	Communicate (opponents/other outside counsel) telephone conference with Shelley Bobman regarding equitable distribution numbers.	0.7	\$320.00	\$224.00
11/16/21	PSP	Draft/revise analysis of the equitable distribution of 401K monies.	0.3	\$320.00	\$96.00
11/16/21	PSP	Communicate (in firm) telephone call with JAM regarding 401K calculations	0.1	\$320.00	\$32.00
11/16/21	JAM	Review/analyze equitable distribution calculations by PSP	0.3	\$420.00	\$126.00
11/17/21	PSP	Communicate (opponents/other outside counsel) emails to/from Shelley Bobman regarding counter offer	0.3	\$320.00	\$96.00
11/17/21	PSP	Communicate (with client) telephone call (two) with Trustee regarding calculating appreciation of 401K and counter-offer.	0.4	\$320.00	\$128.00
11/18/21	PSP	Communicate (other external): Forward email from Trustee with Financial data to special counsel	0.1	\$320.00	\$32.00
11/18/21	PSP	Communicate (opponents/other outside counsel) email from special counsel regarding preparing a response to Brian Gilberg's offers	0.1	\$320.00	\$32.00
11/19/21	PSP	Communicate (opponents/other outside counsel) email to special counsel regarding financials	0.2	\$320.00	\$64.00
11/19/21	PSP	Communicate (with client) telephone call with client regarding Brian Gilberg investments	0.2	\$320.00	\$64.00

11/19/21	PSP	Review/analyze investment income	0.9	\$320.00	\$288.00
11/19/21	PSP	Communicate (opponents/other outside counsel) email to from Brian Gilberg's counsel regarding response	0.2	\$320.00	\$64.00
11/19/21	JAM	Review/analyze 401k distribution and calculation	0.2	\$420.00	\$84.00
11/22/21	PSP	Communicate (opponents/other outside counsel) emails to from Trustee and special counsel regarding email from opponent	0.2	\$320.00	\$64.00
11/24/21	PSP	Communicate (opponents/other outside counsel) email response to special counsel inquiry regarding analysis	0.2	\$320.00	\$64.00
11/24/21	PSP	Communicate (opponents/other outside counsel) email to special counsel regarding settlement offer letter.	0.1	\$320.00	\$32.00
11/24/21	PSP	Communicate (opponents/other outside counsel) telephone call with Shelley Bobman regarding notice of hearing and financial analysis	0.2	\$320.00	\$64.00
11/24/21	PSP	Communicate (with client) telephone call with client regarding settlement offer letter	0.1	\$320.00	\$32.00
12/02/21	PSP	Communicate (opponents/other outside counsel) emails to/from special counsel regarding settlement offer and possible need for expert testimony.	0.4	\$320.00	\$128.00
12/02/21	PSP	Review/analyze email from Special counsel to opponent with counter offer	0.1	\$320.00	\$32.00
12/02/21	PSP	Communicate (opponents/other outside counsel) telephone call with Shelley Bobman regarding settlement counter-offer	0.2	\$320.00	\$64.00
12/02/21	PSP	Communicate (in firm) telephone call with with JAM regarding settlement negotiations	0.2	\$320.00	\$64.00
12/02/21	PSP	Communicate (with client) email to client regarding status of settlement negotiations	0.3	\$320.00	\$96.00
12/02/21	PSP	Communicate (with client) regarding settlement offer	0.2	\$320.00	\$64.00
12/02/21	PSP	Review/analyze email conveying counter offer	0.1	\$320.00	\$32.00
12/03/21	PSP	Communicate (opponents/other outside counsel) email to from Special counsel regarding seeking approval of settlement on shortened time.	0.3	\$320.00	\$96.00
12/03/21	PSP	Communicate (with client) email from opponent with response to settlement offer forwarded to client	0.1	\$320.00	\$32.00
12/06/21	PSP	Communicate (opponents/other outside counsel) email to special counsel regarding issues raised by questions from Michael Bertin.	0.8	\$320.00	\$256.00
12/06/21	PSP	Communicate (opponents/other outside counsel) email to/from special counsel regarding addendum and PSA.	0.2	\$320.00	\$64.00
12/06/21	PSP	Communicate (other external): Email to Michael Infanti regarding email from Michael Bertin regarding QUADRO	0.2	\$320.00	\$64.00
12/06/21	PSP	Communicate (with client) email to Trustee regarding communications with opponent regarding QUADRO expert	0.2	\$320.00	\$64.00
12/06/21	PSP	Review/analyze property settlement agreement	0.3	\$320.00	\$96.00
12/07/21	PSP	Communicate (other external): Email to/from special counsel regarding availability for zoom conference	0.2	\$320.00	\$64.00
12/07/21	PSP	Communicate (other external): emails between all parties regarding zoom conference and QDRO	0.3	\$320.00	\$96.00
12/07/21	PSP	Communicate (other external): Email to/from accountant for trustee regarding QDRO	0.2	\$320.00	\$64.00
12/07/21	PSP	Communicate (other external): telephone call with Dana Roach regarding QDRO and structuring transaction	0.3	\$320.00	\$96.00
12/07/21	PSP	Communicate (with client) email to client regarding QDRO and structuring transaction	0.2	\$320.00	\$64.00
12/07/21	PSP	Communicate (with client) review and forward email by Debtor's matrimonial counsel regarding zoom conference	0.1	\$320.00	\$32.00
12/07/21	PSP	Communicate (with client) emails regarding Jenny Kasen email regarding addendum	0.2	\$320.00	\$64.00
12/09/21	PSP	Communicate (opponents/other outside counsel) email to/from special counsel regarding Kasen requests	0.1	\$320.00	\$32.00
12/09/21	PSP	Plan and prepare for phone conference regarding QDRO	0.3	\$320.00	\$96.00
12/09/21	PSP	Communicate (opponents/other outside counsel) phone conference regarding turnover of 401K, QDRO, tax issues.	1.3	\$320.00	\$416.00
12/10/21	PSP	Communicate (opponents/other outside counsel) email to/from special counsel regarding Bertin email regarding address and amounts for agreement.	0.1	\$320.00	\$32.00

12/10/21	PSP	Communicate (opponents/other outside counsel) email to/from special counsel regarding possible division of tax obligations.	0.2	\$320.00	\$64.00
12/10/21	PSP	Communicate (opponents/other outside counsel) emails to/from Shelley Bobman and Michael Bertin regarding Jenny Kasen's ability to raise objections in the matrimonial court.	0.2	\$320.00	\$64.00
12/10/21	PSP	Communicate (with client) telephone call with with client regarding process of receiving 401K distribution	0.3	\$320.00	\$96.00
12/13/21	PSP	Communicate (opponents/other outside counsel) emails to/from Special counsel regarding 401K	0.2	\$320.00	\$64.00
12/13/21	PSP	Communicate (other external): Email to special counsel regarding 401K plan administrator	0.1	\$320.00	\$32.00
12/13/21	PSP	Communicate (other external): Emails to/from Michael Bertin and special counsel regarding possible swap to resolve 401K issues.	0.3	\$320.00	\$96.00
12/13/21	PSP	Communicate (other external): emails to/from Michael Infanti regarding 401K	0.3	\$320.00	\$96.00
12/13/21	PSP	Communicate (other external): Zoom conference matrimonial court and all parties.	0.9	\$320.00	\$288.00
12/16/21	PSP	Communicate (opponents/other outside counsel) email to/from special counsel regarding proposed phone conference	0.1	\$320.00	\$32.00
12/17/21	PSP	Plan and prepare for Telephone call with parties regarding QDRO	0.2	\$320.00	\$64.00
12/17/21	PSP	Communicate (other external): telephone call with Matthew Morely and Michael Bertin	1.1	\$320.00	\$352.00
12/20/21	PSP	Communicate (opponents/other outside counsel) emails to/from Shelly Bobman regarding communications with Jenny Kasen.	0.2	\$320.00	\$64.00
12/21/21	PSP	Communicate (opponents/other outside counsel) Email to/from special counsel regarding tax advice from Michael Infanti	0.2	\$320.00	\$64.00
01/04/22	PSP	Communicate (opponents/other outside counsel) email to/from special counsel regarding possible way to resolve 401K issues	0.1	\$320.00	\$32.00
01/04/22	PSP	Communicate (opponents/other outside counsel) email to from Michael Bertin regarding status	0.1	\$320.00	\$32.00
01/04/22	PSP	Communicate (opponents/other outside counsel) email to/from Michael Bertin regarding communications with 401K Plan administrator.	0.1	\$320.00	\$32.00
01/13/22	PSP	Communicate (other external): telephone call with with Brian Gilberg's 401K Plan administrator.	0.2	\$320.00	\$64.00
01/13/22	PSP	Draft/revise communication to Brian Gilberg's counsel regarding telephone call with 401K plan administrator.	0.2	\$320.00	\$64.00
01/18/22	PSP	telephone call with Lisa Martin regarding 401K Plan	0.2	\$320.00	\$64.00
01/25/22	PSP	Plan and prepare for telephone call with Lisa Martin regarding 401K issues	0.2	\$320.00	\$64.00
01/25/22	PSP	Communicate (other external): telephone call with with Lisa Martin regarding 401K	0.2	\$320.00	\$64.00
01/25/22	PSP	Communicate (in firm) Conference with JAM Regarding resolution of 401K issues	0.1	\$320.00	\$32.00
01/26/22	PSP	Review/analyze file for equitable distribution figures.	0.3	\$320.00	\$96.00
01/26/22	PSP	Communicate (other external): email from Trustee and to Bertin regarding potential settlement.	0.1	\$320.00	\$32.00
01/31/22	PSP	Communicate (opponents/other outside counsel) email to Shelley Bobman regarding background on proposal.	0.1	\$320.00	\$32.00
01/31/22	PSP	Communicate (opponents/other outside counsel) telephone call with Liz Vaysman regarding settlement	0.2	\$320.00	\$64.00
02/01/22	PSP	Communicate (opponents/other outside counsel) email from/to Michael Bertin regarding acceptance of proposal and drafting agreement.	0.2	\$320.00	\$64.00
02/09/22	PSP	Communicate (opponents/other outside counsel) emails to/from Michael Bertin and Shelley Bobman regarding questions for addendum.	0.2	\$320.00	\$64.00
02/09/22	PSP	Communicate (opponents/other outside counsel) email to client regarding draft addendum to property settlement agreement.	0.1	\$320.00	\$32.00
02/09/22	PSP	Communicate (with client) telephone call with Trustee regarding problems with addendum to property settlement agreement	0.1	\$320.00	\$32.00
02/09/22	PSP	Communicate (opponents/other outside counsel) telephone call with Michael Bertin regarding draft addendum	0.4	\$320.00	\$128.00
02/09/22	PSP	Communicate (opponents/other outside counsel) email to Michael Bertin with proposed additional language	0.3	\$320.00	\$96.00

02/14/22	PSP	Communicate (opponents/other outside counsel) emails to/from Shelley Bobman regarding Kasen objection to proposed addendum.	0.2	\$320.00	\$64.00
02/22/22	PSP	Communicate (with client) Email to Trustee regarding special counsel seeking conference before Pennsylvania matrimonial court judge.	0.1	\$320.00	\$32.00
02/24/22	PSP	Communicate (other external): emails to/from Trustee and special counsel regarding appearance in Pennsylvania divorce matter.	0.2	\$320.00	\$64.00
03/07/22	PSP	Communicate (other external): Phone call to special counsel regarding unavailability for triage conference.	0.2	\$320.00	\$64.00
03/07/22	PSP	Draft/revise memo to special counsel regarding 9019 and Preparation of answer to Court triage conference.	0.6	\$320.00	\$192.00
03/07/22	PSP	Communicate (other external): emails to special counsel regarding triage conference.	0.2	\$320.00	\$64.00
03/07/22	PSP	Communicate (other external): Phone call to special counsel regarding unavailability for triage conference.	0.2	\$320.00	\$64.00
03/07/22	PSP	Communicate (with client) Two telephone calls with Trustee regarding triage conference.	0.3	\$320.00	\$96.00
03/08/22	PSP	Review/analyze emails to matrimonial court from special counsel and Jenny Kasen	0.1	\$320.00	\$32.00
03/08/22	PSP	Communicate (other external): email to/from special counsel regarding communications with Court.	0.1	\$320.00	\$32.00
06/09/22	PSP	Communicate (opponents/other outside counsel) email to from Shelley Bobman regarding bill	0.1	\$320.00	\$32.00
06/10/22	PSP	Communicate (with client) Email to client forwarding special counsel's invoice	0.1	\$320.00	\$32.00
Totals:			69.7		\$22,714.00

II. Bankruptcy Litigation Mediation

There were zero mediations in either this bankruptcy case or the matrimonial case. Yet, Trustee Counsel billed \$1,440 for “Bankruptcy Litigation Mediation” on May 4, 2021.

III. Review of Claims

The examination of proofs of claim is an express duty of the trustee. *See* § 704(a)(5). Yet, as summarized below, the Trustee Counsel billed at least \$512 in connection with the review of claims in this case.

Review of Claims:

Date	Attorney	Description	Hours	Rate	Fee
09/21/20	PP	Bankruptcy Case Administration Review of new navient proof of claim	0.1	\$320.00	\$32.00
10/08/20	PP	Bankruptcy Case Administration Review of AMEX proof of claim	0.1	\$320.00	\$32.00
10/08/20	PP	Bankruptcy Case Administration email to Zwiker & associates re whether amex debt was joint	0.1	\$320.00	\$32.00
11/02/20	PP	Bankruptcy Case Administration Review of toyota claim	0.1	\$320.00	\$32.00
03/10/21	PP	Bankruptcy Case Administration Review of claims register and claims	0.2	\$320.00	\$64.00
06/23/22	PSP	Review/analyze claims	0.4	\$320.00	\$128.00
06/24/22	PSP	Communicate (with client) regarding claims and estate tax return	0.2	\$320.00	\$64.00
06/24/22	PSP	Communicate (in firm) emails to/from JAM regarding telephone call with with Trustee regarding claims.	0.1	\$320.00	\$32.00
06/24/22	PSP	Review/analyze amended AMEX claim	0.1	\$320.00	\$32.00

07/05/22	PSP	Review amended proof of claim from Debtor's matrimonial counsel.	0.1	\$320.00	\$32.00
07/05/22	PSP	Communicate (with client) Email to Trustee regarding amended claims and need for claims motions.	0.1	\$320.00	\$32.00
Totals:			1.6		\$512.00

IV. Investigating the Debtor's Financial Affairs

The investigation of a debtor's financial affairs is an express duty of the trustee. *See* § 704(a)(4). Yet, as summarized below, the Trustee Counsel billed at least around \$10,000 in connection with investigating the Debtor's financial affairs in this case.

Investigate Financial Affairs of Debtor:

Date	Attorney	Description	Hours	Rate	Fee
11/02/19	JAM	Bankruptcy Case Administration- Prepare subpoena to PNC Bank re copy of mortgage note and payoff for 1321 Flat Rock Road	0.8	\$390.00	\$312.00
12/03/19	JAM	Bankruptcy Case Administration- pc to Dusch's office at PNC re lack of response to subpoena	0.2	\$390.00	\$78.00
12/04/19	JAM	Bankruptcy Case Administration- Telephone conference with PNC Legal re subpoena (2x)	0.4	\$390.00	\$156.00
12/04/19	JAM	Bankruptcy Case Administration- Review of response to PNC subpoena	0.3	\$390.00	\$117.00
12/04/19	JAM	Bankruptcy Case Administration- email to client re response to subpoena	0.2	\$390.00	\$78.00
12/30/19	PP	Bankruptcy Case Administration revise correspondence to Jenny Kasen re response to document request	0.2	\$290.00	\$58.00
12/30/19	PP	Bankruptcy Case Administration Prepare 2004 subpoena to former accountant	0.3	\$290.00	\$87.00
12/30/19	PP	Bankruptcy Case Administration Prepare 2004 to Debtor's matrimonial attorney	0.3	\$290.00	\$87.00
12/31/19	PP	Bankruptcy Case Administration Conference with JAM re document demands	0.2	\$290.00	\$58.00
12/31/19	PP	Bankruptcy Case Administration revise 2004 subpoenas	0.2	\$290.00	\$58.00
12/31/19	PP	Bankruptcy Case Administration email to Trustee with draft subpoenas and correspondence to Jenny kasen	0.2	\$290.00	\$58.00
12/31/19	PP	Bankruptcy Case Administration Telephone conference with client re correspondence to Jenny Kasen and response to document demand	0.2	\$290.00	\$58.00
01/17/20	PP	Bankruptcy Case Administration Review of correspondence from Jenny Kasen with documents	0.2	\$290.00	\$58.00
01/22/20	PP	Bankruptcy Case Administration Telephone conference with Jacob Cohen re subpoena	0.2	\$290.00	\$58.00
01/22/20	PP	Bankruptcy Case Administration Review of documents received from Jacob Cohen	0.8	\$290.00	\$232.00
01/23/20	PP	Bankruptcy Case Administration P/c and confirming email from Matthew A. Hamermesh re extension of time to respond to subpoena	0.2	\$290.00	\$58.00
01/23/20	PP	Bankruptcy Case Administration email to/from Jacob Cohen confirming receipt of documents	0.2	\$290.00	\$58.00
01/27/20	PP	Bankruptcy Case Administration email to/from Jacob Cohen confirming receipt of documents	0.2	\$290.00	\$58.00
01/27/20	PP	Bankruptcy Case Administration Review of response to 2004 subpoena from Debtor's matrimonial counsel	0.4	\$290.00	\$116.00
01/28/20	PP	Bankruptcy Case Administration Review of documents received from debtor's former matrimonial counsel	1.2	\$290.00	\$348.00
01/29/20	PP	Bankruptcy Case Administration Review of documents from Debtor's matrimonial attorney and prepare list of financial documents in package	1.2	\$290.00	\$348.00
01/29/20	PP	Bankruptcy Case Administration Letter to client enclosing copy of discovery received from Debtor's former counsel	0.2	\$290.00	\$58.00

01/30/20	PP	Bankruptcy Case Administration Review of debtors credit card statements	0.3	\$290.00	\$87.00
01/30/20	PP	Bankruptcy Case Administration email to trustee re joint debts	0.1	\$290.00	\$29.00
01/31/20	PP	Bankruptcy Case Administration Review of document emailed from Debtor	0.4	\$290.00	\$116.00
02/06/20	PP	Bankruptcy Case Administration Telephone conference with client re status and analysis of documents received	0.3	\$290.00	\$87.00
02/07/20	PP	Bankruptcy asset analysis and recovery prepare for 2004 exam	0.4	\$290.00	\$116.00
02/10/20	PP	Bankruptcy Case Administration Prepare for deposition of debor re equitable distribution	2.2	\$290.00	\$638.00
02/12/20	PP	Bankruptcy Case Administration Prepare 2004 subpoena to debtor	0.7	\$290.00	\$203.00
03/03/20	PP	Bankruptcy Case Administration Review of 2004 subpoena	0.2	\$290.00	\$58.00
03/05/20	JAM	Bankruptcy Case Administration- Review of Kasen response to Debtor subpoena and conference with PSP	0.8	\$390.00	\$312.00
03/05/20	PP	Bankruptcy Case Administration Review of documents received from 2004 to Debtor	0.3	\$290.00	\$87.00
03/05/20	PP	Bankruptcy Case Administration Review of documents received from Debtor's matrimonial counsel	1.7	\$290.00	\$493.00
03/05/20	PP	Bankruptcy Case Administration Prepare 2004 subpoena to Debtor's spouse's matrimonial counsel	0.4	\$290.00	\$116.00
03/05/20	PP	Bankruptcy Case Administration Prepare 2004 subpoena to Debtor's spouse's matrimonial counsel	0.3	\$290.00	\$87.00
03/06/20	PP	Bankruptcy Case Administration revise 2004 to Non-debtor spouse	0.4	\$290.00	\$116.00
03/19/20	PP	Bankruptcy Case Administration Telephone conference with Michael Vagoni re 2004 subpoenas	0.2	\$290.00	\$58.00
03/20/20	PP	Bankruptcy Case Administration email to/from Michael Vagnoni re scheduling conference call	0.1	\$290.00	\$29.00
03/24/20	PP	Bankruptcy Case Administration File Review before conference call	0.3	\$290.00	\$87.00
03/24/20	PP	Bankruptcy Case Administration Telephone conference with Non-debtor's spouse's matrimonial and bankruptcy counsel	1	\$290.00	\$290.00
03/25/20	PP	Bankruptcy Case Administration Review of Philadelphia property records for Debtor and non-Debtor spouse	0.3	\$290.00	\$87.00
03/25/20	PP	Bankruptcy Case Administration email to client re telephone conference with counsel for Brian Gilberg re matrimonial case and 2004 subpoenas	0.5	\$290.00	\$145.00
04/13/20	PP	Bankruptcy Case Administration email to/from Michael Vagnoni re response to 2004 subpoena	0.2	\$290.00	\$58.00
04/14/20	PP	Bankruptcy Case Administration Review of 2004 subpoena	0.2	\$290.00	\$58.00
04/14/20	PP	Bankruptcy Case Administration File Review for response to subpoena	0.3	\$290.00	\$87.00
04/15/20	JAM	Bankruptcy Case Administration- Review of subpoena to Joe Marchand and forward to him	0.4	\$390.00	\$156.00
04/27/20	PP	Bankruptcy Case Administration Review of documents received in discovery	1.8	\$290.00	\$522.00
04/27/20	PP	Bankruptcy Case Administration Prepare memo re documents received in discovery	0.4	\$290.00	\$116.00
04/30/20	JAM	Bankruptcy Case Administration- review file re asset analysis	0.8	\$390.00	\$312.00
10/28/20	PP	Bankruptcy Litigation File Review tax documents of debtor and audit results	1.4	\$320.00	\$448.00
11/14/20	PP	Bankruptcy Litigation Review of CMA and forward to Trustee	0.2	\$320.00	\$64.00
11/14/20	PP	Bankruptcy Litigation email to/from Trish Pappano re CMA	0.2	\$320.00	\$64.00
12/01/20	PP	Bankruptcy Case Administration Telephone conference with accountant re subpoena	0.2	\$290.00	\$58.00
12/11/20	PP	Bankruptcy Case Administration Prepare 2004 subpoena	0.3	\$320.00	\$96.00
12/22/20	PL	Bankruptcy Case Administration- Service ltr encl 2004 Subp to Brian Gilberg	0.4	\$125.00	\$50.00
01/29/21	PP	Bankruptcy Case Administration email to counsel to Brian Gilberg re documents	0.1	\$320.00	\$32.00
02/17/21	PP	Bankruptcy Litigation Review of discovery from Brian Gilberg	0.9	\$320.00	\$288.00

02/17/21	PP	Bankruptcy Litigation memo to file re documents received from Brian Gilberg, undisclosed assets, potential value of estate's interest	1.9	\$320.00	\$608.00
02/17/21	PP	Bankruptcy Litigation email to Trustee with documents	0.1	\$320.00	\$32.00
02/19/21	PP	Bankruptcy Case Administration Letter to adversary re missing documents from 2004	0.9	\$320.00	\$288.00
02/23/21	PP	Bankruptcy Case Administration Review of correspondence from counsel for Brian Giberg re documents and subpoena	0.1	\$320.00	\$32.00
02/25/21	PP	Bankruptcy Case Administration email to Michael Barone requesting additional information to subpoena bank records	0.2	\$320.00	\$64.00
03/03/21	PP	Bankruptcy Case Administration 2004 subpoena to Ascensus	0.3	\$320.00	\$96.00
03/12/21	JAM	Bankruptcy Case Administration- Telephone conference with Acensure re 2004 subpoena	0.2	\$420.00	\$84.00
03/24/21	PP	Bankruptcy Case Administration Telephone conference with ascensus re downloading subpoenaed documents	0.2	\$320.00	\$64.00
03/25/21	PP	Bankruptcy Case Administration download and review subpoena response	0.4	\$320.00	\$128.00
05/27/21	PP	Bankruptcy Case Administration email to Michael Bertin requesting copy of debtor's husband's 401K plan.	0.2	\$320.00	\$64.00
05/28/21	PP	Bankruptcy Case Administration email to Michael Bertin requesting copy of debtor's husband's 401K plan.	0.1	\$320.00	\$32.00
10/22/21	PSP	Review/analyze documents from Brian Gilberg	0.4	\$320.00	\$128.00
11/08/21	PSP	Review/analyze emails between parties regarding documents, phone conference	0.2	\$320.00	\$64.00
12/21/21	PSP	Review/analyze documents in file regarding Brian Gilbergs 401K plan.	0.2	\$320.00	\$64.00
Totals:			32.4		\$9,995.00

V. Applications to Employ Professionals

“[P]reparing application for employment of professional” is one of the “services [that] are generally considered trustee duties for which attorney’s fees are not allowed...”. *In re 388 Route 22 Readington Holdings, LLC, 2021 Bankr. LEXIS 56, *18-20 (Bankr. D.N.J. Jan. 11, 2021) (emphasis added) affd, In re 388 Route 22 Readington Holdings, LLC, 2021 U.S. Dist. LEXIS 245102, *17-18 (D.N.J. Dec. 23, 2021)*. Yet, as summarized below, the Trustee Counsel billed at least \$2,097 in connection with preparing applications to retain professionals in this case.

Applications to Employ Professionals:

Date	Attorney	Description	Hours	Rate	Fee
10/18/19	JAM	Bankruptcy fee-employment applications-prepare application to appoint attorney	0.5	\$390.00	\$195.00
11/02/19	JAM	Bankruptcy fee-employment applications- Prepare supplemental affidavit in support of retention	0.4	\$390.00	\$156.00
11/04/19	PL	Bankruptcy fee-employment applications- E-file Supplemental Certification to Application for Retention of Attorney for Trustee	0.2	\$125.00	\$25.00
07/15/20	JAM	Bankruptcy fee-employment applications- Prepare Supplemental Certification in Support of the Application for Retention of Professional re rate changes	0.4	\$390.00	\$156.00
07/16/20	PL	Bankruptcy fee-employment applications- E-file Supplemental Certification re rate change	0.3	\$125.00	\$37.50
10/02/20	PP	Bankruptcy Case Administration Telephone conference with potential special counsel for matrimonial case	0.1	\$320.00	\$32.00
10/02/20	PP	Bankruptcy Case Administration email to Trustee re P/C with potential special counsel	0.2	\$320.00	\$64.00
10/08/20	PP	Bankruptcy Case Administration Telephone conference with prospective special counsel in matrimonial case.	0.2	\$320.00	\$64.00
10/09/20	PP	Bankruptcy Case Administration Telephone conference with Jeff Kurtzman re representation in	0.1	\$320.00	\$32.00

		matrimonial action			
10/09/20	PP	Bankruptcy Case Administration Telephone conference with Carol Slocumb re referral	0.2	\$320.00	\$64.00
10/13/20	PP	Bankruptcy Case Administration Telephone conference with client re potential special counsel	0.2	\$320.00	\$64.00
10/28/20	PP	Bankruptcy Case Administration Telephone conference with Rochelle Bobman re representation as special counsel	0.5	\$320.00	\$160.00
10/28/20	PP	Bankruptcy Case Administration Internet search of potential special counsel	0.2	\$320.00	\$64.00
10/29/20	PL	Bankruptcy fee-employment applications- Prepare Application for Retention of Bobman re matrimonial matter	0.5	\$125.00	\$62.50
10/29/20	PP	Bankruptcy Case Administration review revise retention application for special counsel	0.1	\$320.00	\$32.00
10/29/20	PP	Bankruptcy Case Administration Telephone conference with client re potential special counsel	0.2	\$320.00	\$64.00
10/30/20	PP	Bankruptcy Case Administration Telephone conference with client re retention of special counsel	0.1	\$320.00	\$32.00
10/30/20	PP	Bankruptcy Case Administration email to proposed special counsel with retention certification	0.1	\$320.00	\$32.00
11/02/20	PP	Bankruptcy Case Administration Review of email from proposed special counsel and forward same to client	0.2	\$320.00	\$64.00
11/03/20	PP	Bankruptcy Case Administration Review of signed retention papers	0.1	\$320.00	\$32.00
11/03/20	PP	Bankruptcy Case Administration file special counsel retention application	0.2	\$320.00	\$64.00
11/03/20	PL	Bankruptcy fee-employment applications- Service ltr encl App for Retention re Bobman	0.2	\$125.00	\$25.00
11/12/20	PP	Bankruptcy Case Administration email to to Special counsel re retention order and dates for document subpoenas	0.2	\$320.00	\$64.00
05/14/21	PP	Bankruptcy Case Administration email to/from Donna Miller re retention	0.1	\$320.00	\$32.00
05/14/21	PP	Bankruptcy Case Administration Review of retention application for accountant	0.1	\$320.00	\$32.00
05/18/21	PP	Bankruptcy Case Administration Letter to parties serving retention application	0.2	\$320.00	\$64.00
05/24/21	PP	Bankruptcy Case Administration email to/from accountants with Order on Application for Retention	0.2	\$320.00	\$64.00
12/08/21	PSP	Communicate (other external): telephone call with Matt Morley regarding retention	0.2	\$320.00	\$64.00
12/09/21	PSP	Draft/revise Retention application	0.8	\$320.00	\$256.00
Totals:			7		\$2,097.00

VI. Fee Applications

As summarized below, Trustee Counsel billed an extraordinary amount of time for the preparation of fee applications in this case.

Fee Application Related Fees:

Date	Attorney	Description	Hours	Rate	Fee
11/16/21	PSP	Review/analyze fees to date	0.1	\$320.00	\$32.00
07/19/22	PSP	Communicate (in firm) email to Carol Getz regarding fee app	0.1	\$320.00	\$32.00
07/19/22	PSP	Communicate (in firm) emails between JAM and Trustee regarding fee apps for special counsel.	0.1	\$320.00	\$32.00
07/19/22	JAM	Communicate (with client) email client regarding Special Counsel fee application	0.2	\$420.00	\$84.00

08/01/22	PSP	Draft/revise Special Counsel's fee application	2.2	\$320.00	\$704.00
08/02/22	JAM	Draft/revise Bobman Fee Application	1.3	\$420.00	\$546.00
08/02/22	JAM	Draft/revise Fee Application for McDowell Law	2	\$420.00	\$840.00
08/02/22	PSP	Draft/revise Fee Application cover sheet for Michelle Bobman.	0.3	\$320.00	\$96.00
08/02/22	PSP	Communicate (opponents/other outside counsel) Email to Shelly Bobman regarding draft fee app, deficiencies, fixes.	0.3	\$320.00	\$96.00
08/03/22	PSP	Draft/revise fee applications.	0.4	\$320.00	\$128.00
08/11/22	PSP	Communicate (other external): emails to/from Michelle Bobman regarding fee app.	0.3	\$320.00	\$96.00
08/12/22	PSP	Draft/revise Revise Bobman fee app	0.6	\$320.00	\$192.00
08/15/22	PSP	Review/analyze Special counsels invoices and emails.	0.9	\$320.00	\$288.00
08/15/22	PSP	Communicate (with client) telephone call with with Trustee regarding special counsel fee app	0.2	\$320.00	\$64.00
08/18/22	PSP	Communicate (with client) telephone call with with client regarding special counsel fee app	0.2	\$320.00	\$64.00
08/18/22	PSP	Communicate (opponents/other outside counsel) email to special counsel regarding fee app	0.1	\$320.00	\$32.00
08/19/22	PSP	Draft/revise Review and revise Bobman fee app.	0.6	\$320.00	\$192.00
08/19/22	PSP	Communicate (other external): email to Michelle Bobman regarding issues with fee app.	0.2	\$320.00	\$64.00
09/20/22	PSP	Draft/revise fee applications.	1.3	\$320.00	\$416.00
Totals:			11.4		\$3,998.00

VII. Non-Legal Ministerial Duties of the Trustee

As summarized below, Trustee Counsel billed for non-legal ministerial duties of the trustee.

Ministerial Duties of the Trustee:

Date	Attorney	Description	Hours	Rate	Fee
10/29/19	JAM	Bankruptcy Case Administration-review motion for relief by Toyota Lease Trust	0.3	\$390.00	\$117.00
11/27/19	PP	Bankruptcy Case Administration Prepare stipulation extending time to object to exemptions	0.3	\$290.00	\$87.00
11/27/19	PP	Bankruptcy Case Administration email to Jenny Kasen with stipulation extending time to object to exemptions	0.2	\$290.00	\$58.00
12/02/19	PP	Bankruptcy Case Administration email to/from Jenny Kasen re extending time to object to exemptions	0.1	\$290.00	\$29.00
12/02/19	PP	Bankruptcy Case Administration file stipulation extending time to object to exemptions	0.1	\$290.00	\$29.00
12/23/19	PP	Bankruptcy Case Administration Review of amended Schedules D H	0.1	\$290.00	\$29.00
01/16/19	PP	Bankruptcy Case Administration Review of amended schedule c	0.2	\$290.00	\$58.00
01/17/20	PP	Bankruptcy Case Administration Prepare stipulation extending time to object to exemptions	0.1	\$290.00	\$29.00
03/03/20	PP	<i>Bankruptcy Case Administration Review of amended schedules</i>	0.2	\$290.00	\$58.00
03/10/20	PP	Bankruptcy Case Administration Prepare stipulation extending time to object to exemptions	0.2	\$290.00	\$58.00
03/10/20	PP	Bankruptcy Case Administration Telephone conference with Jenny Kasen re extension of time	0.2	\$290.00	\$58.00

03/10/20	PP	Bankruptcy Case Administration Letter to Debtors counsel re stipulation	0.2	\$290.00	\$58.00
03/11/20	PP	Bankruptcy Case Administration file stipulation extending time	0.2	\$290.00	\$58.00
Totals:			2.4		\$726.00

VIII. Conclusion

Trustee Counsel seeks compensation in the total amount of \$73,833.26, all of which is on account of legal fees, except for \$183.51 in expenses.

The \$73,833.26 in legal fees for which Trustee Counsel seeks compensation is more than four (4) times what Debtor's counsel charged the Debtor for both this bankruptcy case and the divorce case.

Special Counsel seeks compensation in the total amount of \$18,495.42, all of which is on account of legal fees, except for \$82.92 in expenses.

The \$18,495.42 in legal fees for which Special Counsel seeks compensation is more than what Debtor's counsel charged the Debtor for both the bankruptcy case and the divorce case.

Also, Special Counsel has not produced any times sheets showing the time spent in 1/10th of an hour increments by date, person, and description of services rendered.

Due to Special Counsel's failure to produce any itemized time sheets, it is impossible to know whether Trustee Counsel and Special Counsel have double billed.

Notwithstanding the foregoing, Trustee Counsel's itemized time sheets reflect an extraordinary amount of time improperly and potentially double billed.

Neither Trustee Counsel or Special Counsel should be allowed any fees that could have been potentially double billed unless and until Special Counsel produced an itemized time sheet.

Moreover, Trustee Counsel should not be allowed any fees for excessive billing, acting as liason between special counsel and trustee, the fictional "bankruptcy mediation" it billed for, review of claims, investigation of the debtor's financial affairs, retention applications, or other ministerial and standard trustee duties.

Respectfully,

/s/ Jenny R. Kasen

JENNY R. KASEN

JRK: jk
Via ECF